

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY ("HTA"),

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

**MOTION OF AMBAC ASSURANCE CORPORATION, ASSURED GUARANTY CORP.,  
ASSURED GUARANTY MUNICIPAL CORP., NATIONAL PUBLIC FINANCE  
GUARANTEE CORPORATION, FINANCIAL GUARANTY INSURANCE COMPANY,  
THE BANK OF NEW YORK MELLON, AND U.S. BANK TRUST NATIONAL  
ASSOCIATION TO REDACT PREVIOUSLY FILED DOCUMENTS PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9037(H)**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Ambac<sup>2</sup>, Assured, National, FGIC, The Bank of New York Mellon, in its capacity as successor trustee for the CCDA bondholders, and U.S. Bank, in its capacity as successor trustee for the PRIFA bondholders (collectively, “Movants”) by and through their undersigned attorneys, respectfully submit this motion to redact (the “Motion to Redact”) certain papers related to the lift stay motions (the “Lift Stay Motions”). Attached hereto as **Exhibit A** is a proposed order granting the Motion to Redact, and as **Exhibits B-G** are the proposed redacted documents, as required by Fed. R. Bankr. P. 9037(h)(1)(B). In further support of the Motion to Redact, Movants respectfully state as follows:

1. On April 30, 2020, Movants filed certain exhibits in connection with counsel declarations supporting the Lift Stay Motions. The following exhibits contained financial account numbers, which should have been redacted in part, pursuant to Fed. R. Bankr. P. 9037(a)(4):

- a. Exhibit 66 to the Declaration of William Natbony (originally filed as ECF No. 13004-71 and as ECF No. 780-71 in Case No. 17-3567 and proposed redacted version attached hereto as Exhibit B);
- b. Exhibit 39 to the Declaration of Atara Miller (originally filed as ECF No. 12998-15, and proposed redacted version attached hereto as Exhibit C); and
- c. Exhibits 38, 41, 42, and 45 to the Declaration of John J. Hughes, III (originally filed as ECF Nos. 13007-19, 13007-22, 13007-23, and 13007-26, and proposed redacted versions attached hereto as Exhibits D-G, respectively).

2. Pursuant to Fed. R. Bankr. P. 9037(h), Movants seek to substitute the redacted exhibits attached as Exhibits B-G for the previously filed unredacted exhibits. The unredacted

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<sup>2</sup> Unless otherwise specified, defined terms have the meanings given to them in the *Stipulation and Protective Order* (ECF No. 12912) (the “Protective Order”) and Lift Stay Motions.

versions of the aforementioned exhibits have since been removed from the public filing system, as required by Fed. R. Bankr. P. 9037(h)(2).

*[Remainder of Page Intentionally Omitted]*

Dated: May 6, 2020  
San Juan, Puerto Rico

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**CERTIFICATE OF SERVICE**

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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